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IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF UTAH

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UNITED STATES OF AMERICA,

Plaintiff,

vs.

RYAN GREGORY BRACKEN,

Defendant.

Case No. 2:24mj337 JCB

COMPLAINT

SEALED

Judge Jared C. Bennett

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Before the Honorable Jared C. Bennett, United States Magistrate Judge for the  
District of Utah, appeared the undersigned, who on oath deposes and says:

**COUNT I**  
**18 U.S.C. § 2261A - Stalking**

On or about April 1, 2024, in the District of Utah,

RYAN GREGORY BRACKEN,

the defendant herein, did, with the intent to harass and intimidate another person, used a facility of interstate commerce, to-wit: a cellular telephone, to engage in a course of conduct that placed a person in reasonable fear of serious bodily injury to a person, and did

cause substantial emotional distress to such person; all in violation of 18 U.S.C. § 2261A(2) and punishable under 18 U.S.C. § 2261(b)(5).

This complaint is made on the basis of investigation consisting of the following:

I am a Special Agent (SA) with Homeland Security Investigations (HSI). I have been employed by HSI since July 2017. Prior to HSI, I was a Police Officer, Criminal Investigator and an FBI Task Force Officer in Cameron County, Texas for a combined eight (8) years. As a HSI Special Agent, I am an “investigative or law enforcement officer” within the meaning of Title 18, United States Code, Section 2510(7), that is, an officer of the United States who is empowered by law to conduct investigations and to make arrests for offenses enumerated in Title 21 and Title 18. In my work with HSI and from my previous experience, I have received training and I have conducted investigations that have involved various offenses to include fraud, theft, drug trafficking and money laundering offenses. I have received courses of instruction relating to investigative techniques and conducting narcotics and financial investigations. I have participated in and have conducted investigations that have resulted in the arrests of individuals who have smuggled, received, and distributed controlled substances as well as the seizure of illegal drugs and proceeds derived from the sale of those illegal drugs. In addition, I have conducted follow-up investigations concerning the concealment of narcotics-produced assets, money, bank records, etc., and the identification of co-conspirators through the use of ledgers, records, telephone bills, and photographs, as related to drug trafficking. I have authored multiple state and federal search warrants to include pen register, trap and trace devices, and Title

III (wiretaps) affidavits.

The elements of Stalking in violation of 18 U.S.C. § 2261A are:

*First*, that the defendant used a facility of interstate commerce to engage in a course of conduct; and

*Second*, that he did so with the intent to harass and intimidate a person; and

*Third*, that by doing so the defendant placed that person in reasonable fear of serious bodily injury or caused substantial emotional distress to that person.

Beginning in late March, 2024, defendant RYAN GREGORY BRACKEN made a series of telephone calls from a cellular telephone number 801-XXX-1363. This device is a cellular device subscribed to Ryan Bracken at 4051 South 3515 West, West Valley City, Utah. The service provider is T-Mobile. During many of the calls, RYAN GREGORY BRACKEN identified himself and provided his cellular telephone number.

On April 1, 2024, RYAN GREGORY BRACKEN called the Salt Lake County Recorder's Office. He left a voicemail for W.K., a Recorder's Office employee. According to W.K., "the tone of the voicemail was aggressive, abusive verbally, and threatening." W.K. specified that "several times during the call he alleged that the [Salt Lake County Recorder] and I were guilty of treason and made a point of stating that the penalty for treason is death." W.K. was frightened by this voicemail, indicating that he viewed it a "a direct threat to [his] safety, the safety of [the Salt Lake County Recorder], and the safety of our staff." Finally, W.K. noted that BRACKEN had made multiple previous calls to the Recorder's Office and that his behavior was "becoming increasingly

verbally abusive and threatening.” A review of the voicemail left for W.K. confirmed that BRACKEN identified himself as “the Attorney in Fact for the estate of Ryan Gregory Bracken,” and left his telephone number. He stated that if he was ignored, “this definitely will be resting on your heads and I shouldn’t have to remind you what the penalty is for treason. The last time I checked, it was fucking death.”

On April 2, 2024, RYAN GREGORY BRACKEN called the Salt Lake County Sheriff’s Office in an attempt to speak with the elected Sheriff. BRACKEN began the call indicating that he had been attempting to reach the Sheriff but had been unsuccessful “for a week or so now.” BRACKEN further indicated that he had “left several messages.” BRACKEN reported that he needed to speak with the Sheriff regarding a “fraudulent Sheriff’s sale on [his] property” scheduled for April 8. BRACKEN claimed that the sale “can not go on” because, according to BRACKEN, “it’s a fucking criminal act.”

During a call approximately 20 minutes in duration, BRACKEN expressed frustration that he had been ignored by multiple people including “Sheriff Rosie Herrera [sic]” and that as a result, he would “open fire” on the “first person who shows up to [his] fucking property to try to evict [his] ass.” When he was informed that he could be transferred to the Sheriff’s administrative assistant, BRACKEN stated that he had already done that and “left several messages.” He then repeated his threat to “open fire” on any person who came to his property in an attempt to evict him. He further stated that he would “spit hot lead at them.” BRACKEN continued to rant, threatening violence against Sheriff’s Office personnel. He stated that he would “leave another message” but he would

“keep bothering you fuckers all fucking week until that bitch answers,” advising the person to whom he was speaking that she “might as well take [her] happy ass up there and fucking let them know, “Hey! You should actually answer this guy because I’m fucking sick of dealing with him.” He then vowed that as soon as he had left the message for the Sheriff, he would “call you back and fuck with you again.”

Detective Jake Fuller with the Salt Lake County Sheriff’s Office then took the telephone, urging BRACKEN to calm down. For approximately 13 minutes, BRACKEN continued to shout about the imminent foreclosure and sale of his property. During this period, only Detective Fuller’s voice can be heard on the recording. However, Detective Fuller reported that BRACKEN advised that if any Sheriff’s deputy came onto his property, he would shoot them. BRACKEN made specific reference to having a 7.62 millimeter firearm, alleging that he would “throw hot lead” and was a “crack shot.”

BRACKEN called the Salt Lake County Sheriff’s Office for a second time on April 2, 2024. Again he sought to speak with the Sheriff. BRACKEN stated that if the Sheriff’s sale of his property occurred, he would “hold Sheriff Rosie Herrera [sic] responsible for treasonous acts and she will swing from a rope. I guarantee you.” Later in the call, BRACKEN repeated a second time, “I will hold her ass accountable for treasonous acts and she will swing from a fucking rope. Period.” Still later, BRACKEN asserted that the Sheriff “will go down for treasonous affairs and there will be a fucking rope with her fucking name on it.” BRACKEN expressed frustration that he had left “several, nice, and very cordial fucking messages for her to return my calls.” Then, a third time, BRACKEN

stated “she’s going to swing for fucking treason.” After approximately ten minutes of similar threats, BRACKEN stated “so, whoever shows up to my house to try to show, to serve eviction notices on real property for foreclosure that they don’t have delegation of authority to foreclose on, I will open fire on. I will spit hot lead, 7.62 at their fucking faces. And I am a crack shot.” This call lasted a total of 23 minutes. The person who received it ultimately hung up. BRACKEN called back 4 more times that day, seeking to speak with Sheriff Rivera.

Information obtained from Information Technology specialists with Salt Lake County government revealed that BRACKEN called various Salt Lake County government offices, to include the Sheriff’s Office and the Assessor’s Office, 32 times in April 2024 alone.

Based on the foregoing information, your affiant respectfully requests that a warrant of arrest be issued for RYAN BRACKEN for violations of 18 U.S.C. § 2261A.

Zackary Rhinehart /s/  
Affiant, Zackary Rhinehart  
Special Agent, Homeland Security Investigations

SUBSCRIBED AND SWORN to before me this 4th day of April, 2024.

A handwritten signature in black ink, appearing to read "Jared C. Bennett", written over a horizontal line.

Jared C. Bennett  
United States Magistrate Judge

APPROVED:

TRINA A. HIGGINS  
United States Attorney

/s/ Sirena Miller Wissler  
SIRENA MILLER WISSLER  
Assistant United States Attorney